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DATE: March 12, 2012

TO: Kelley Chase, EPA Region 3 OSC
Cynthia Caporale, EPA Region 3 OASQA

THROUGH: Ex. 4 - CBI SERAS Program Manager
Ex. 4 - CBI SERAS QA/QC Officer

FROM: Ex. 4 - CBI Data Validation Chemist

SUBJECT: VERIFICATION/COMPLETENESS CHECK – DIMOCK, PA LABORATORY DATA
Test America-Validated Report-R33917 480-15712-1.PDF

INTRODUCTION

On March 12, 2012, a review of the case narratives and corresponding certificates of analysis from Test America Laboratory (Glycols Report Posted Feb. 27) was reviewed at the SERAS facility in accordance with the Follow-Up Verification/Completeness Check agreed upon during our teleconference on Wednesday 2/8/12.

The assumptions for this review include the following: 1) Case narratives from the Regional labs and/or subcontract labs have been reviewed in accordance with Regional or Environmental Services Assessment Team (ESAT) protocols and contain all pertinent and complete information to conduct the completeness check. SERAS will base this review on the information provided by the laboratory and not on an actual data package; and 2) SERAS will relay any "red" flags to the EPA R3 personnel to resolve and determine data usability.

OBSERVATIONS

In accordance with Table 1 – Field and QC Sampling Summary (Rev01 - 2/3/12), Table 2 – Sample Analytical Requirements Summary (Rev01 – 2/3/12), Methods for Groundwater and Surface Water Samples and SW-846 8015B, the following observations were noted and need to be clarified/resolved.

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1. Method blank (MB 480-50495/1) contained triethylene glycol and diethylene glycol above the method detection limit (MDL). The associated samples are qualified as follows: triethylene glycol is non-detect (U) for samples FB07, HW18, HW26 and HW26-P. Diethylene glycol is non-detect (U) for samples FB07, HW18, HW18-P, HW20, HW20-P, HW25-P, HW26, HW26-P, HW29 and HW29Z. Method blank (MB 480 50613/1-A) contained diethylene glycol above the MDL. The associated samples are qualified as follows: diethylene glycol non-detect (U) for samples HW32, HW32-P, HW33, HW33A-P, HW33B-P, HW34A-P and HW52.
2. On qualifications of detections based on a second column analysis, Section 7.6.4 of SW846 8015B states, tentative identification of a single component analyte occurs when a peak from a sample extract falls within the daily retention time window. Confirmation is required on a second column or by GC/MS. Since the flame ionization detector is non-specific, it is highly recommended that GC/MS confirmation be performed on single component analytes unless historical data are available to support the identification(s). The qualification of unusable "R" by the Region 3 validation team is agreed upon for triethylene glycol results for

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samples HW32 and HW34a if results greater than the MDL but less than the RL are to be reported. If results <RL are reported as recommended by SW-846 methods, then these results become a 10U.
NOTE: Waiting for a response on this issue.

3. The holding times were checked from the time of collection on the chain of custody (COC) to the time of analysis on the analysis log sheet. Holding time review was based on a 14-day period. No additional qualifications are required.
4. Raw data was not provided, it is assumed that all sample detections were within the established retention time criteria and the stated concentrations in the LCS and MS/MSD tables are correct and pass their QC criteria. No additional qualifications are required.
5. A 4 point initial calibration was used by the laboratory instead of the recommended minimum of 5 points. As previously noted in a response from Fred Foreman on 3/9/12, the lab uses a modified analysis and typically uses a 4-point calibration. No additional qualifications are required.

cc: Ex. 4 - CBI SERAS Project Officer
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